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Attorneys for Plaintiff and Counter-Defendants
NEVADA CORPORATE HEADQUARTERS
and JASON WILLIAMS

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

NEVADA CORPORATE HEADQUARTERS,
A Nevada Corporation

Plaintiff,

vs.

JANETTE M. HILL; JOHN DOE;
ATTORNEY DOE; and DOES I through X and
ROE Corporations or Business Entities I
through X, inclusive,

Defendants.

JANETTE M. HILL, individually,

Counterclaimant,

vs.

NEVADA CORPORATE HEADQUARTERS,
A Nevada Corporation, JASON WILLIAMS,
individually, ALFONSO VALLE, individually,

Counter-Defendant.

Case No.: 20-CV-01721-RFB-VCF

**STIPULATION TO EXTEND DEADLINE
FOR PLAINTIFF AND COUNTER-
DEFENDANTS TO RESPOND TO
DEFENDANT/COUNTERCLAIMANT'S
COUNTERCLAIM**

1 IT IS HEREBY STIPULATED by and between Plaintiff and Counter-Defendant
2 NEVADA CORPORATE HEADQUARTERS (“Plaintiff” and “Counter-Defendant”) and
3 JASON WILLIAMS (“Counter-Defendant”), through their counsel of record and
4 Defendant/Counterclaimant JANETTE M. HILL by and through her counsel of record that
5 Defendant and Counterclaimant shall have a ten (10) day extension of time to submit its response
6 to Defendant/Counterclaimant’s Counterclaim, up to and including October 5, 2020. This
7 Stipulation is submitted and based upon the following:

8 1. Plaintiff and Counter-Defendants filed a Notice of Removal on September 16,
9 2020. ECF No. 1. Defendant/Counterclaimant was served with the Notice of Removal
10 September 16, 2020. ECF No. 1.

11 2. Counter-Defendants’ response to the Counterclaims is currently due on
12 September 21, 2020.

13 3. Counter-Defendants identified issues which would be the subject of a motion to
14 dismiss, namely the lack of allegations indicating Counterclaimant exhausted her administrative
15 remedies and the inclusion of individually named defendants as parties in alleged violations of
16 Title VII.

17 4. Counterclaimant has requested an opportunity to file an Amended Complaint to
18 correct these issues and which may alleviate the necessity of filing a motion to dismiss.

19 5. Accordingly, the parties have agreed that Counter-Defendants shall have up to and
20 including October 5, 2020 to file a response to the Counterclaim. If Counterclaimant submits an
21 Amended Complaint, Plaintiff/Counter-Defendants shall have an additional fourteen (14) days
22 from the date the Amended Complaint is served to file a response.

23 6. This is the first request for an extension of time for Plaintiff and Counter-
24 Defendants to file a response to Defendant and Counterclaimant’s Counterclaim.

25 7. This request is made in good faith and not for the purpose of delay.
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1 8. Nothing in this Stipulation, nor the fact of entering to the same, shall be construed
2 as waiving any claim and/or defense held by any party.

3 Dated this 21st day of September, 2020.

4 LAGOMARSINO LAW

JACKSON LEWIS P.C.

5 /s/ Andre M. Lagomarsino
6 ANDRE M. LAGOMARSINO, ESQ.
7 Nevada Bar No. 6711
8 3005 W. Horizon Ridge Pkwy., #241
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/s/ Lisa A. McClane
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Las Vegas, Nevada 89101

9 Attorney for Defendant/Counterclaimant

Attorneys for Plaintiff and Counter-Defendant

10 **ORDER**

11 IT IS SO ORDERED.

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13 _____
14 U.S. Magistrate Judge

15 Dated: 9-30-2020
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